

February 13, 2004

Mr. Scott Ziegler
BP Products North America Inc.
633 Wyndclift Circle
Austintown, OH 44515

Re: Exempt Construction and Operation Status,
097-18366-00520

Dear Mr. Ziegler:

The letter from BP Products North America, Inc. (BP), received on January 8, 2004 by Indiana Department of Environmental Management, Office of Air Quality (OAQ) and January 23 by the City of Indianapolis, Office of Environmental Services (OES), has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following HVDPE remedial system designed to recover and treat petroleum impacted groundwater and soil vapors, to be located at 8510 Ditch Road, Indianapolis, Indiana, 46260-2120, (former Amoco Station No. 10117) is classified as exempt from air pollution permit requirements:

This project consists of the following process/equipment:

- (a) One (1) high vacuum dual phase extraction (HVDPE) system which consists of a 40 gallon vapor liquid separator (VLS) with associated stack and 10 hp vacuum pump, with a nominal capacity of 15 cfm and discharge to the atmosphere;
One (1) transfer pump, bag filter and two (2) carbon filter units, with final discharge to the Howard Johnson Ditch pursuant to NPDES permit ING 080185.

The following condition shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated

averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the OES and the OAQ, if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez
Administrator

JC/cmb

cc: Chris Parks, Handex
Mindy Hahn, IDEM
files (2 copies)

**Indiana Department of Environmental Management
Office of Air Quality
And
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: BP Products North America, Inc. (BP)
Source Location: 8510 Ditch Road
County: Marion
SIC Code: 5541
Operation Permit No.: 097-18366-00520
Permit Reviewer: Carmen Bugay

The City of Indianapolis, Office of Environmental Services (OES) and the Indiana Department of Environmental Management, Office of Air Quality (OAQ), have reviewed information for the former Amoco Station No. 10117, submitted on January 8, 2004 to OAQ and on January 23, 2004 to OES, for an exemption from BP Products of North America, Inc. (BP) for the soil and groundwater remediation project.

The remediation process will involve emissions from a remedial system, a high vacuum dual phase extraction (HVDPE) system with an attached stack, for the recovery and treatment of petroleum impacted groundwater and soil vapors. The emission from this HVDPE system will contain hazardous air pollutants. However, through the information provided on this remediation project, BP has submitted justification that the remediation activities do not meet the criteria for an air permit and thus, should receive an exemption.

This remediation project will be permitted as an exemption.

Proposed Emission Unit

This project consists of the following process/equipment:

- (a) One (1) high vacuum dual phase extraction (HVDPE) system which consists of a 40 gallon vapor liquid separator (VLS) with associated stack and 10 hp vacuum pump, with a nominal capacity of 15 cfm and discharge to the atmosphere. One (1) transfer pump, bag filter and two (2) carbon filter units, with final discharge to the Howard Johnson Ditch pursuant to NPDES permit ING 08018.

Existing Approvals

There are no existing approvals issued to this source.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (inches) | Flow Rate (cfm) | Temperature |
|----------|--|------------------|----------------------|--------------------|-------------|
| S1 | Vapor Liquid Separator (VLS) with vacuum pump | 10 | 4 | 15 | Ambient |

*These emissions do not mix with other stacks.

Emission Calculations

The estimated calculations submitted by the applicant have been verified and found to be acceptable. Maximum VOC emissions were calculated based on worst case scenario of effluent concentration 8,000 ppmv and a vapor recovery rate of 15 cfm with the potential to emit (PTE) as 8.4 tons per year. Hazardous Air Pollutant (HAP) determination was based on previous air sample concentrations from another site. A correlation was derived based on percentage of BTEX to VOC readings, taken with a Flame Ionization Detector (FID).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the Exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the information submitted by the applicant.

An information letter for the purposes of this review was received by OAQ on January 8, 2004 and received by OES on January 23, 2004. Additional information was received on January 27 and February 4, 2004.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution agency".

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

| Pollutant | Potential To Emit (tons/year) |
|------------------|----------------------------------|
| PM | negligible |
| PM ₁₀ | negligible |
| SO ₂ | negligible |
| VOC | less than 10 tons/year |
| CO | negligible |
| NO _x | negligible |

| HAPs | PTE (tons/year) |
|-------------------------------|--------------------|
| Benzene | 0.588 |
| Toluene | 0.168 |
| Ethylbenzene | 0.084 |
| Xylene | 0.252 |
| Total combined HAPs (tons/yr) | 1.092 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1 (29)) of the pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

The source is located in Marion County.

| Pollutant | Status |
|------------------|------------------------|
| PM ₁₀ | attainment |
| SO ₂ | maintenance attainment |
| NO ₂ | attainment |
| Ozone | maintenance attainment |
| CO | attainment |
| Lead | unclassifiable |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO_x, Ozone, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited) is as explained in table and (a) below:

| Pollutant | Emissions (ton/yr) |
|------------------|-----------------------|
| PM | N/A |
| PM ₁₀ | N/A |
| SO ₂ | N/A |
| VOC | 8.4 |
| CO | N/A |
| NO _x | N/A |
| Single HAP | 0.588 |
| Combination HAPs | 1.092 |

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) Each criteria pollutant is less than 100 tons per year,
- (b) A single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) Any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source at this location.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source. In addition, Subpart GGGGG (National Emission Standards for Site Remediation) does not apply, since the project is not a major source of HAP emissions.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review Rules: General Provisions; Applicability) and or 326 IAC 2-5.1 (Construction of New Sources).

326 IAC 2-4.1(HAPs Major Sources; New Source Toxics Control)

This exemption has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (60 readings), as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6 (Particulate Rules)

- (a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.
- (b) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source.

326 IAC 7 (Sulfur Dioxide Rules)

This source does not have any emission unit with the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7 does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

- (a) The potential to emit of this project is less than 25 tons per year therefore, 326 IAC 8-1-6 does not apply.
- (b) There are no other 326 IAC 8 rules applicable to source.

Conclusion

The soil and groundwater remediation project proposed for BP located at 8510 Ditch Road, Indianapolis, Indiana 46260-2120 shall be subject to the conditions of the attached exemption number 097-18366-00520.